

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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MARCO BEMEJO, WILMER EUCLIDES BUENOLUJA,  
BRAYAN IGNACIO MUNOZ, JOSE ALBERTO  
AGUALSACA, SEGUNDO TACURI, GEOVANNY  
PULAGUACHI, and SAUL DOTA CARCHI, individually  
and on behalf of all others similarly situated,

Plaintiffs,

-against-

SHAKER CONTRACTORS, CORP., and SHAHBAZ  
SHER and SHAHID SHER, as individuals,


Defendants.  
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**NOTICE OF MOTION**  
**FOR ENTRY OF DEFAULT**  
**JUDGMENT IN A SUM**  
**CERTAIN AGAINST**  
**ALL DEFENDANTS**

Civil Docket No.:  
22-cv-01427 (JPC)

PLEASE TAKE NOTICE, that upon the annexed Affirmation of Avraham Y. Scher, Esq., dated the 17<sup>th</sup> day of May, 2022, together with supporting Exhibits A through J annexed therewith and submitted in support of this motion, and upon all prior pleadings and proceedings heretofore had herein, the undersigned, on behalf of all Plaintiffs in this action, will move this Court, before the Honorable John P. Cronan, United States District Judge, at the United States District Court, Southern District of New York, located in Courtroom 12D, at 500 Pearl Street, Room 1320, New York, NY 10007, on a date and time as determined by The Court, for an Order granting the Plaintiffs' Motion for Entry of a Default Judgment in a Sum Certain as against the Defendants, Shaker Contractors, Corp., and Shahbaz Sher, and Shahid Sher, as individuals, and for such or further other relief as The Court deems proper, and just.

Dated: Kew Gardens, New York  
May 17, 2022

  
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Avraham Y. Scher, Esq.  
Helen F. Dalton & Associates, P.C.

80-02 Kew Gardens Road, Suite 601  
Kew Gardens, New York 11415

**SERVICE TO:** *All Defendants via United Postal Service (“UPS”) overnight courier:*

**SHAHBAZ SHER**

SHAKER CONTRACTORS, CORP.  
245 Throggs Neck Blvd  
Bronx, NY 10465

**SHAHID SHER**

SHAKER CONTRACTORS, CORP.  
251 Throggs Neck Blvd  
Bronx, NY 10465

**SHAKER CONTRACTORS, CORP**

SHAKER CONTRACTORS, CORP.  
245 Throggs Neck Blvd  
Bronx, NY 10465

(see Affirmation of Service submitted and filed herewith)

**CC:** [CronanNYSDChambers@nysd.uscourts.gov](mailto:CronanNYSDChambers@nysd.uscourts.gov)